

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

LUIS ACEVEDO GARCIA, et als PLAINTIFFS	CASE NO. 97-2639 (JP)
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VS.

MUNICIPIO DE ADJUNTAS, et als DEFENDANTS	
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**NOTICE & MOTION**

**TO THE HONORABLE COURT:**

**COMES NOW** the undersigned and most respectfully replies to the averments, and insinuation of plaintiffs counsel:

- A. Upon receipt of the “Motion”<sup>1</sup> authored by plaintiffs’ counsel, I had no where to go but to the peace and tranquility of our library.
1. I searched in our bookshelves and focused on William Shakespear’s, Hamlet.
  2. I was lucky to find the famous and inspirational words of Prince Hamlet of Denmark.
  3. “To reply or not reply”, was the question; and over the counsel and objection of several of my colleagues, I now take arms against a sea of troubled waters.

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<sup>1</sup>May 24, 2007.

4. My recollection of our obligations to this Honorable Court was that the financial advisor to Adjuntas would prepare a plan or plans as to how to pay off the judgment of this Honorable Court as quickly and expeditiously to plaintiffs.
5. The following is our recollection of our commitments and if we are confused or in a state of forgetfulness, I beg the assistance of all counsel present during our last hearing.
6. The financial advisor was to research and study the financial situation which Adjuntas has faced, is facing, and will face in the future.
7. He did so and came up with two (2) options which, are not acceptable to plaintiffs' counsel.
8. Plaintiffs would criticize and, in fact criticized, the budget's limitation and constraint of the present administration.
9. They suggest the services of a barber to pay the "Judgement" a task not easily accomplished without harm to the citizens and residents of Adjuntas.
10. The plaintiffs criticize and reference accounts 01-03-04-9411, 01-03-04-9465 and 01-16-04-9447.
11. They specifically aver that three (3) accounts are for legal services<sup>2</sup>.
12. It is cases, like the one of caption, that accountant for the amounts singed out by plaintiffs.
13. Plaintiffs limit themselves to averring that "They<sup>3</sup> have to make a good faith effort in reducing nonessential expenses .....".

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<sup>2</sup>\$151,200.00.

<sup>3</sup>We must infer reference to Adjunta's Chief Executive Officer and his team of financial advisors.

14. Plaintiffs have gone so far as to suggest that subpoenas be issued to the Chief Executive Officer of Puerto Rico, his assistants and department heads to appear before this Honorable Court.
15. The suggestion has not and will not be accepted, especially since Standard and Poors' opinion re: the value of the Commonwealth's bonds.
16. That is not to say that we would oppose such a tactic to bring to bear this case to a conclusion.
17. Reference to a "well thought out plan" is naught but a play on words.
18. Adjuntas can only survive, abby and with a well administered0000000000 government.
19. What plaintiffs appear to suggest is a petition to the U.S. Bankruptcy Court.
20. That is not the solution and we strongly aver that the mayor of Adjuntas will not resort to such recourse.

**We say no more in opposition and now remain respectfully.**

In Ponce, Puerto Rico this 30<sup>th</sup> of May 2007.

I hereby **CERTIFY** that on this date, I electronically filed the foregoing *with the Clerk of the Court* using the CM/ECF system which will send notification of such filing to the following: to Israel Roldan-González, Esq., 44 Progreso Street, Aguadilla, PR 00603.

**RESPECTFULLY,**

**S/Harry R. Segarra**

Harry R. Segarra

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